

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ECOBEE, INC.,

Plaintiff,

v.

ECOFACITOR, INC.,

Defendant.

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C.A. No. 21-323-MN

**JURY TRIAL DEMANDED**

**PLAINTIFF ECOBEE, INC.’S MOTION FOR SUMMARY JUDGMENT  
OF NO INDUCED INFRINGEMENT OF THE ASSERTED PATENTS**

Pursuant to Federal Rule of Civil Procedure 56, Plaintiff ecobee, Inc. (“ecobee”) respectfully moves this Court for an order, substantially in the form attached hereto, for summary judgment of no induced infringement of U.S. Patent Nos. 8,596,550, 8,886,488 and 10,612,983. The grounds for this motion are set forth in ecobee’s Opening Brief in Support of its Motions for Summary Judgment for Non-Infringement and Invalidity.

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Dated: July 21, 2023

/s/ Kelly E. Farnan

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